INSTITUTE FOR CONSTITUTIONAL ADVOCACY AND PROTECTION GEORGETOWN UNIVERSITY LAW CENTER

January 6, 2023

VIA CM-ECF

Hon. Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: McGill v. New York, Case No. 21-cv-08619 (S.D.N.Y)

Dear Judge Liman,

We represent the parties in the above-captioned matter. We write pursuant to this Court's November 3, 2022 Order staying all discovery by 60 days and directing the parties to provide a status report on or before January 6, 2023.

The Court stayed discovery on November 3 so that the parties could explore the possibility of settlement. That stay expired on January 2, 2023. In the meantime, the parties have been focused on settlement negotiations, and they have not conducted any discovery.

The parties have a settlement conference with Magistrate Judge Katharine H. Parker scheduled for February 13, 2023. To enable their continued focus on reaching a settlement, the parties jointly request that the Court stay all discovery for another period of 60 days.

Respectfully submitted,

/s/Seth Wayne

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